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23 Additional Counsel Listed on Next Page

24 UNITED STATES DISTRICT COURT
25 NORTHERN DISTRICT OF CALIFORNIA
26 SAN FRANCISCO DISTRICT

27 ROOSEVELT KAIRY, LARRY BROWN,
28 WAYNE DICKSON, DRAKE OSMUN, AND
HARJINDER SINGHDIETZ On Behalf of
Themselves, All Other Similarly Situated,
And The General Public,

Plaintiffs,

vs.

SUPERSHUTTLE INTERNATIONAL, INC.;
SUPERSHUTTLE FRANCHISE
CORPORATION, and DOES 1 through 20,
inclusive,

Defendants.

Case No.: 08-CV-02993-JSW(BZ)

**JOINT PROPOSAL RE ANTICIPATED
MOTIONS**

AND ORDER THEREON

1 Additional Counsel for Defendants

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Pursuant to the Court's instructions at the June 26, 2009 Case Management Conference, the parties submit the following proposed schedule for briefing and hearing upcoming motions and suggested page limitations for each motion. The parties also propose that a further Case Management Conference be scheduled along with each motion hearing date set forth below, to allow the Court and parties to revisit and modify as necessary the motion schedule and related issues in response to case developments.

1. Defendants' Motion to Dismiss for Lack of Subject Matter Jurisdiction (FRCP Rule 12) and Defendants' Motion to Dismiss for Failure to Join Required Parties (FRCP Rule 19)

- A. Motions to be filed: August 17, 2009
Briefs on each motion not to exceed 25 pages
- B. Oppositions to be filed: September 4, 2009
Briefs on each motion not to exceed 25 pages
- C. Replies to be filed: September 11, 2009
Briefs on each motion not to exceed 15 pages
- D. Hearing date: September 25, 2009

2. Plaintiffs' Motion for Certification of Class (FRCP Rule 23)

- A. Motion to be filed: October 16, 2009
Brief not to exceed 40 pages
- B. Opposition to be filed: November 25, 2009
Brief not to exceed 40 pages
- C. Reply to be filed: December 23, 2009
Brief not to exceed 20 pages
- D. Hearing date: ~~January 8, 2010~~ January 15, 2010

3. Cross-Motions for Summary Judgment and/or Partial Summary Judgment

- A. Defendants' Motion to be filed: May 7, 2010
- B. Plaintiffs' Motion to be filed and
Plaintiffs' Opposition to be filed: June 4, 2010
- C. Defendants' Opposition to be filed
and Defendants' Reply to be filed: July 2, 2010

D. Plaintiffs' Reply to be filed: July 16, 2010
E. Hearing date: August 6, 2010

The parties anticipate requesting an expansion on page limits for these cross-motions. However, as the scope of the motions will depend upon this Court's earlier rulings, the parties are not yet in a position to give an informed estimate of the number of pages necessary to adequately address the issues.

4. Other Motions

The parties expect that other motions will be filed, including a motion for decertification of the FLSA collective action; however, the details of such motions are not sufficiently known to include them in a schedule at this time.

Dated: July 2, 2009

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By: 

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